

MELINDA HAAG (CABN 132612)  
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

MATTHEW L. McCARTHY (CABN 217871)  
FRANK J. RIEBLI (CABN 221152)  
Assistant United States Attorneys

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
FAX: (415) 436-7234  
Matthew.McCarthy@usdoj.gov  
Frank.Riebli@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 13-574 WHA
	)	
Plaintiff,	)	STIPULATION AND ORDER EXCLUDING TIME
	)	
v.	)	
	)	
MARTIN BUCIO-AYALA,	)	
ARNOLDO MADRIGAL-ROSALES,	)	
a/k/a Nonin Rosales, a/k/a Noni,	)	
	)	
Defendants.	)	

UNITED STATES OF AMERICA,	)	CASE NO. CR 13-575 WHA
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MIGUEL MONTES-TORRES,	)	
a/k/a Jose,	)	
JORGE HERNANDEZ-PENA,	)	
a/k/a Javier Herrera-Tafolla,	)	
	)	
DEFENDANTS.	)	

On November 19, 2013, at 2:00 p.m., defendants Martin Bucio-Ayala, Arnolando Madrigal Rosales

STIPULATION AND ORDER EXCLUDING TIME  
CR 13-574 WHA, CR 13-575 WHA

1 and Jorge Hernandez-Pena appeared before the District Court through counsel. Miguel Montes-Torres  
 2 failed to appear in person, though his counsel was present. The parties agreed to return before the Court  
 3 on December 17, 2013 at 2:00 p.m. Prior to the hearing, the government provided additional discovery  
 4 to defense counsel. The government anticipates providing additional discovery to defense counsel prior  
 5 to December 17, 2013. The parties agree that defense counsel require time to review the discovery and  
 6 discuss it with their clients. Therefore, the parties agreed that time should be excluded between  
 7 November 19, 2013 and December 17, 2013 in order to ensure the effective preparation of counsel. 18  
 8 U.S.C. § 3161(h)(7)(B)(iv).

9 DATED: October 2, 2013

Respectfully submitted,

10 MELINDA HAAG  
 11 United States Attorney

12 /s/  
 13 FRANK J. RIEBLI  
 Assistant United States Attorney

14 /s/ Frank Riebli with permission  
 15 SARA RIEF  
 16 Attorney for Martin Bucio-Ayala


17 /s/ Frank Riebli with permission  
 18 ALAN DRESSLER  
 19 Attorney for Arnoldo Madrigal Rosales

20 /s/ Frank Riebli with permission  
 21 ADAM GASNER  
 22 Attorney for Jorge Hernandez-Pena

23 /s/ Frank Riebli with permission  
 24 STEVE TEICH  
 25 Attorney for Miguel Montes-Torres

1 For the reasons stated above, the Court finds that the exclusion of time from November 19, 2013  
2 through and including December 17, 2013 is warranted and that the ends of justice served by the  
3 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
4 3161(h)(7)(A). The failure to grant the requested continuance would deny the defendant effective  
5 preparation of counsel, and would result in a miscarriage of justice. 18 U.S.C. § 3161(h)(7)(B)(iv).  
6 SO ORDERED.

7 DATED: ~~November~~ \_\_\_\_\_, 2013.  
8 December 2

  
HONORABLE WILLIAM H. ALSUP  
United States District Court Judge